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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MARIA TSATAS, an individual; LEONIDAS VALKANAS, as trustee of the KEET TRUST dated August 1, 2015; RAYMOND BARAZ, an individual; PASCAL ABDALLAH, an individual; JIMMY TSOUTSOURAS, an individual; FOTINI VENETIS, an individual; NICHOLAS TSOUTSOURAS, an individual; CONNIE TSOUTSOURAS, an individual; RAYMONDE KANHA, an individual; ALFRED BEKHIT, an individual; JACQUEZ ELBAZ, an individual; MARTINE BENEZRA, an individual; JAMES P. CARROLL, an individual; DAVID CHIN, an individual; JENNIFER MILLS, an individual; PAUL SUBLETT, an individual; ANDREW SUBLETT, an individual; MANOLIS KOSTAKIS, an individual; ESTHER GEORGAKOPOULOS, an individual; EVAGELIA KOSTAKIS, an individual; DENIS PARSONS, an individual; SOFIA KARDARAS, an individual; JIMMY ASMAKLIS, an individual; CORRADINO

CASE NO.: 2:20-cv-2045-RFB-BNW

**STIPULATION TO EXTEND TIME TO
FILE RESPONSES AND REPLY BRIEFS
TO DEFENDANTS' MOTION FOR CASE
DISPOSITIVE SANCTIONS (ECF NO. 242)
BY 7 DAYS**

(Second Request)

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1 GALUPPO, an individual; DENIS KOPITAS,
2 an individual; TERRY TSATAS, an
individual; GEORGE TSATAS, an individual;
3 PANAGIOTA TSATAS, an individual;
OURANIA TSATAS, an individual;
4 KIRIAKOS PRIMBAS, an individual;
EVANTHIA PRIMBAS, an individual;
PATRICK AYOUB, an individual; MICHAEL
5 BESCEC, an individual; ERNEST LEBOEUF,
an individual; PHILIPPE LEGAULT, an
individual; EFTIHIOS LITSAKIS, an
6 individual; GIOVANNI MONCADA, an
individual; MARC RIEL, an individual;
7 JARADEH SALIM, an individual; HANI
HAMAM, an individual; CONSTANTIN
8 ZISSIS, an individual; BESSIE PEPPAS, an
individual; NIKI PALIOVRAKAS, an
9 individual,

10 Plaintiffs,

11 v.

12 AIRBORNE WIRELESS NETWORK, INC., a
Nevada Corporation; MICHAEL J. WARREN,
13 an individual; J. EDWARD DANIELS, an
individual; MARIUS DE MOS, an individual;
14 JASON DE MOS, an individual; ROBERT
BRUCE HARRIS, an individual; KELLY
15 KABILAFKAS, an individual; and
APCENTIVE, INC., a Nevada Corporation,

16 Defendants.
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STIPULATED REQUEST FOR *SECOND* EXTENSION OF DEADLINE TO FILE
RESPONSE AND REPLY BRIEFS TO ECF NO. 242

Plaintiffs (as listed in the above caption, with the exception of the ten named plaintiffs for whom the Court granted a Motion to Withdraw (ECF No. 219) and for which there is a pending unopposed request to dismiss them (ECF No. 236)) and Defendants (as listed in the above caption, with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and through their undersigned counsel of record, submit this Stipulation to Extend Time to File Responses and Replies pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

WHEREAS, on March 7, 2024, Defendants filed a Motion for Case Dispositive Sanctions for Perjury and Other Misconduct Against All Plaintiffs, or in the Alternative Against Plaintiff Leonidas Valkanas, as Trustee of the Keet Trust (ECF No. 242).

WHEREAS, the Parties met and conferred about material that was filed in the Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) that Plaintiffs designated as “CONFIDENTIAL” pursuant to the August 9, 2021 Stipulated Protective Order and Confidentiality Agreement (ECF No. 64).

WHEREAS, on March 14, 2024, the Parties reached a stipulation to strike (ECF No. 245) the Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) and replace it with the Amended Declaration of Peter L. Chasey, Esq. (ECF No. 243-1), filed on March 13, 2024 and which redacted the information Plaintiffs designated as “CONFIDENTIAL.”

WHEREAS, the meet and confer process regarding the “CONFIDENTIAL” material took time away from Plaintiffs’ ability to oppose Defendants’ Motion (ECF No. 242) on the merits.

WHEREAS, the Parties reached a stipulation to extend Plaintiffs’ response date to Defendants’ Motion by one week (ECF No. 246), which the Court granted on March 18, 2024 (ECF No. 248).

WHEREAS, the Parties agreed that Plaintiffs could have an additional week to respond to Defendants’ Motion, without prejudice to requesting an additional week, if needed. ECF No. 246 at p. 3. Plaintiffs’ counsel disclosed to Defendants’ counsel that he had a case set for trial on April 3, 2024, and Defendants’ counsel had no objection, as a professional courtesy, to an additional

extension, if needed.

WHEREAS, Plaintiffs' counsel needs an additional week to respond to Defendants' Motion because of significant pre-trial responsibilities in another matter set for trial on April 3, 2024 (including the preparation of pre-trial filings due on March 22, 2024 and opposing two ex parte applications on March 20, 2024, which were heard on March 21, 2024).

WHEREAS, this is the Parties' second request for an extension of the deadlines to file a Response and Reply Brief to Defendants' Motion (ECF No. 242).

THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their respective attorneys of record, that, for good cause, the deadlines to file a Response and Reply Brief to Defendants' Motion (ECF No. 242) is extended by one week as follows (with one additional day for the reply brief as an agreed-upon professional courtesy):

Current deadline to file Response to Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	March 28, 2024
New deadline to file Response to Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	April 4, 2024
Current deadline to file Replies re Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	April 4, 2024
New deadline to file Replies re Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	April 12, 2024

IT IS SO STIPULATED.

DATED: March 25, 2024

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Respectfully submitted.

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By: /s/ Andrew B. Goodman

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DATED: March 25, 2024

Respectfully submitted.

CHASEY LAW OFFICES
LAW OFFICES OF S. DON BENNION

By: /s/ Peter Chasey

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Attorneys for Defendants

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 3/26/2024

CERTIFICATE OF SERVICE

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On March 25, 2024, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

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DATED March 25, 2024.

/s/ Amanda McGill

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